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July 2, 2025

VIA ECF

Hon. Elizabeth A. Pascal, U.S.M.J.
Mitchell H. Cohen Bldg. & Courthouse
4th and Cooper Streets
Camden, New Jersey 08101

**Re: Atlantic Subsea, Inc., v Northern Divers USA, Inc., et al.
Civil No. 23-198 (KMW/EAP)**

**Northern Divers USA, Inc. v. Atlantic Subsea, Inc., et al.
Civil No. 24-8279 (KMW/EAP)**

Dear Judge Pascal:

This firm is local counsel for Xylem Dewatering Solutions, Inc. (“XDS”) in the above-referenced Civil No. 24-8279, which is currently being managed with the above-referenced Civil No. 23-198. Pursuant to the Scheduling Order filed on May 9, 2025, the deadline to serve initial written discovery requests is July 2, 2025.

On June 25, 2025, Plaintiff Northern Divers USA, Inc. (“Northern Divers”) and XDS entered into a settlement in principle. As a result, Northern Divers and XDS respectfully request that Your Honor extend the deadline to serve initial discovery requests for 30 days, to August 1, 2025.

Additionally, XDS’ Motion to Dismiss the First Amended Complaint (the “Motion to Dismiss”) (Dkt. No. 56), which is currently pending before your Honor, is returnable on July 7, 2025. Plaintiff and XDS respectfully request that Your Honor adjourn the return date of XDS’ Motion to Dismiss to August 4, 2025, to allow the parties sufficient time to finalize the settlement.

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Should the Court have any questions regarding this submission, please do not hesitate to have your staff contact me.

Respectfully submitted,

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